

**Scharf-Norton Center for
Constitutional Litigation at the
GOLDWATER INSTITUTE**

*Matthew R. Miller
*Jonathan Riches
500 E. Coronado Rd.
Phoenix, Arizona 85004
(602) 462-5000
litigation@goldwaterinstitute.org

BARNETT LAW FIRM

Colin L. Hunter
Jordy L. Stern
1905 Wyoming Boulevard Northeast
Albuquerque, New Mexico 87112
(505) 275-3200
colin@theblf.com
jordy@theblf.com

Attorneys for Plaintiff

*Motion for pro hac vice pending

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

RIO GRANDE FOUNDATION,

Plaintiff,

vs.

CITY OF SANTA FE, NEW MEXICO; and
CITY OF SANTA FE ETHICS AND
CAMPAIGN REVIEW BOARD,

Defendants,

No. 1:17-cv-00768-JCH-CG

**PARTIES' STIPULATION AND
JOINT MOTION TO EXTEND
DISPOSITIVE MOTION DEADLINES
AND TO EXCEED PAGE
LIMITATIONS**

The parties stipulate to, and jointly move this court to enter an Order extending the time for the filing of Motions for Summary Judgment. The parties propose that Plaintiffs' and Defendants' Motions for Summary Judgment be filed by June 11, 2018 with Responses due by July 16, 2018 and Replies due by August 6, 2018.

This is the parties' first request for an extension in this case. It is not being requested for purposes of delay, but so that the parties may fully brief their cross-motions for summary judgment as effectively as possible in order to bring this case to a just resolution.

The parties further jointly move this court to enter an Order expanding the page limitations as follows: Motions not to exceed forty (40) pages, Responses not to exceed thirty (30) pages, and Replies not to exceed fifteen (15) pages.

These page limit extensions are necessary so that the parties may fully brief the complex legal issues involved in this case.

RESPECTFULLY SUBMITTED this 24th day of April, 2018 by:

/s/ Matthew R. Miller

*Matthew R. Miller

*Jonathan Riches

**Scharf-Norton Center for Constitutional Litigation
at the GOLDWATER INSTITUTE**

Colin L. Hunter

Jordy L. Stern

BARNETT LAW FIRM

Attorneys for Plaintiff

*Appearing *pro hac vice*.

/s/ Marcos D. Martinez with permission

Marcos D. Martinez

Assistant City Attorney

**KELLY BRENNAN, CITY ATTORNEY
CITY OF SANTA FE, NEW MEXICO**

CERTIFICATE OF SERVICE

Document Electronically Filed and Served by ECF this 24th day of April, 2018 to:

Marcos D. Martínez
Assistant City Attorney
City of Santa Fe
200 Lincoln Avenue
P.O. Box 909
Santa Fe, New Mexico 87504-0909
mdmartinez@ci.santa-fe.nm.us

/s/ Kris Schlott

Kris Schlott, Paralegal